

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Twana Ahmed,	§	
	§	
<i>Plaintiff,</i>	§	Civil Action No. 4:23-cv-02823
	§	
v.	§	The Honorable Lee H. Rosenthal
	§	
Universal Protection Service, LP, d/b/a	§	Jury Demand
Allied Universal Security Services	§	
	§	
<i>Defendant.</i>	§	

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**PLAINTIFF TWANA AHMED’S PROPOSED QUESTIONS  
FOR THE COURT’S EXAMINATION OF PROSPECTIVE JURORS**

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Mr. Ahmed’s attorneys interpret the Court’s request for jury selection questions to mean proposed questions for the Court to ask prospective jurors. They do, however, request time for attorney-led questioning of prospective jurors. Should the Court permit time for attorney-led questioning and require the parties to file their proposed questions, Mr. Ahmed’s attorneys respectfully request the opportunity to supplement the below proposed questions. They raised this issue and question in the parties’ proposed JPTO.

1. The plaintiff in this case is Twana Ahmed. Do you know Mr. Ahmed?

2. The attorneys for Mr. Ahmed are Amanda Hernandez, Amy Gibson, and David Wiley.

Do you know any of these attorneys?

3. The defendant in this case is Universal Protection Service, LP, which does business as Allied Universal. Do you know this company? If you have had dealings with this company, what was the nature of those dealings? When did your experience with Allied Universal or the people that work for Allied Universal take place? Would your past experience with Allied Universal have any effect on your ability to be impartial as a juror in this case?

4. Allied Universal is represented by the attorneys Jessica Chang, Nathan Shine, and Gary R. Kessler. Do you know these attorneys?

5. Do you know any of the following persons who may be called as witnesses in this case? (List names on pretrial witness lists).

6. Have you or someone you care about ever been a party, either plaintiff or defendant, in a civil case that was filed in the last 10 years? What was the nature of the case? What was the outcome?

7. Have you ever been a witness in a case?

8. Have you ever served on a jury before?

8. Has there been any experience in your personal life, or the personal life of someone close to you that you believe would influence your judgment as a fair and impartial juror in this case?

9. Does anyone have any reason that they feel they cannot serve on a jury?

10. Does anyone feel like they should not serve as a juror for this particular case?

11. Have any of you ever been let go from a job ... or has someone you care about been let go from a job?

[follow-up](#)

Do you believe it was unfair?

Please tell us about that

12. What, generally, do you believe an employer should be able to expect from an employee?

13. What, generally, do you believe an employee should be able to expect from an employer?

14. Who do you believe discrimination laws are designed to protect ... all of us or just some?

15. Are laws against discrimination important?

[follow-up](#)

please tell us more about that

16. Who here feels that government is overreaching or micromanaging with workplace discrimination laws ... or that people are using our nation's laws to get special treatment?

17. Do you believe workplace discrimination today is worse ... better ... or about the same as 20 years ago?

follow-up

please tell us more about that

18. Do you believe discrimination is a significant concern in the workplace today?

19. Do you believe companies are responsible for the actions of their managers, or do you believe something more is required?

20. Have you heard of at-will employment and how do you think it interacts with laws against discrimination?

21. Some people believe that a person who has experienced discrimination can suffer emotional distress as a result of that experience, other people believe discrimination is not bad enough to cause emotional distress. Which way do you lean?

22. Some people believe someone who experienced illegal discrimination is entitled to recover for the emotional harm that the evidence supports, and other people say no to that kind of compensation. Which way do you lean?

23. How do you feel about the responsibility of serving on a jury?

24. What is your top favorite television show or movie?

Respectfully submitted,

*/s/ Amanda Hernandez*

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